

Exhibit A

From: [REDACTED]@seegerweiss.com>

Date: October 23, 2020 at 8:38:41 AM EDT

Subject: RE: Davenport - Henry Motion

Justin,

As you know, we cannot facilitate discovery for your claims from the various administrators. We have submitted to the Court our formal response on this matter, and on the current record, we think that a request for more information from us (or the administrators) is not appropriate or warranted.

[REDACTED]

From: justin wyatt [mailto:justin@jrwyattlaw.com]

Sent: Tuesday, October 20, 2020 11:45 AM

To: [REDACTED]@seegerweiss.com>

Cc: Cyril V. Smith <csmith@zuckerman.com>

Subject: Davenport - Henry Motion

Hi,

As per our discussion of today, the above-movants request that Class Counsel obtain certain information about qualification rates for black and white players in the BAP. Specifically, we are looking for the qualification rate (i.e., number of tests administered vs. number of qualifying diagnosis) for Level 1.5 and 2.0 claims stratified by race (i.e., the white qualification rate vs black qualification rate) in the BAP. You previously indicated that you will be looking at the issue, and the Special Masters' Davenport Decision says that the decision of what norms to use may be extremely consequential.

This information should be obtainable from Epiq as each NPE contains the race of the player and race must be identified in order to use the Heaton norms.

To the extent we can assist in obtaining this information, please let us know.

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